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May 13, 2024

VIA ELECTRONIC FILING

Hon. John J. Sinatra, Jr.
Western District Court of New York
2 Niagara Square
Buffalo, New York 14202

Dear Judge Sinatra:

Re: Umbra LLC v. The Corporations, et al.
Our File No.: 11705.35574

We represent plaintiff Umbra LLC (“plaintiff”) in the above-referenced matter. In accordance with the Preliminary Injunction Order entered on March 29, 2024 (Dkt. No. 7) (“PI Order”), plaintiff provides the instant status update.

By March 27, 2024, pursuant to the alternative methods of service authorized by the TRO, plaintiff served the Summons, Complaint, TRO, all papers filed in support of the Application and the March 15, 2024 Order on each and every defendant except for defendants 6, 8, 11, 12, 48, and 57. On April 3, 2024, pursuant to the alternative methods of service authorized by the TRO, plaintiff served defendants 12, 48, and 57 with summonses upon plaintiff’s receipt of the signed summonses. Thereafter, on April 3, 2024, pursuant to the alternative methods of service authorized by the TRO and the PI Order, plaintiff served the PI Order on each and every defendant except defendants 6, 8, and 11. To date, none of the defendants, or attorneys on their behalf, have formally appeared, answered or otherwise moved with respect to the Complaint in the action. Accordingly, except for defendants 6, 8, and 11, plaintiff intends to move for default judgment against all remaining defendants currently in default by June 4, 2024.

Very truly yours,

Taylor L. Kent